

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA**

<b>IN RE:</b>	]	
	]	<b>CHAPTER 11</b>
<b>MULLIS GARAGE &amp; AUTO PARTS, LLC,</b>	]	<b>CASE NO: 15-30116-SDB</b>
<b>DEBTOR.</b>	]	

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**MOTION FOR EXPEDITED HEARING ON DEBTOR'S MOTION FOR ENTRY OF AN  
ORDER (I) AUTHORIZING THE DEBTOR TO OBTAIN POSTPETITION  
FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 364(b), AND  
GRANTING RELATED RELIEF**

**COMES NOW** the Debtor who shows this Court the following:

1.

The Debtor as Debtor-In-Possession has filed a Motion for Entry of an Order (I) Authorizing the Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§105, 361, 362 364(b), and (II) Granting Related Relief to authorize it to obtain post-petition financing pursuant to the terms and conditions of a Loan Agreement.

2.

The nature of the Motion requires expedited in hearing inasmuch as the Debtor needs a capital infusion to assist with the operation and maintenance of the business.

3.

The Court has authority to set hearings on an expedited basis upon separate Motion and Certificate of Necessity.

**WHEREFORE**, the Debtor respectfully prays that this Court:

a.) expedite the hearing on the Debtor's Motion for Entry of an Order (I) Authorizing the Debtor to Obtain PostPetition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 364(b) and (II) Granting Related Relief within five days from the date of approval of this Motion or such other time

as the Court deems appropriate under the circumstances; and

b.) grant the Debtor any and all further relief as is just.

**SO MOVED** this 1<sup>st</sup> day of May 2015.

**MERRILL & STONE, LLC**

**s/Jon A. Levis**

JON A. LEVIS  
ATTORNEY FOR DEBTOR  
GEORGIA BAR NO: 448848

LAW OFFICES:

MERRILL & STONE, LLC  
SECOND FLOOR - MITCHELL BUILDING  
101 S. MAIN STREET  
POST OFFICE BOX 129  
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(478)237-7029  
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**CERTIFICATE OF NEED**

**THE UNDERSIGNED** certifies that the Debtor's estate could suffer immediate and irreparable harm unless an expedited hearing is held to consider the Debtor's Motion of the Debtor for Order Authorizing the Debtor to Pay Prepetition Taxes inasmuch as the Debtor needs a capital infusion to assist with the operation and maintenance of the business.

**THIS** 1st day of May, 2015.

**MERRILL & STONE, LLC**

**s/Jon A. Levis**

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JON A. LEVIS  
ATTORNEY FOR DEBTOR  
GEORGIA BAR NO: 448848

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**EMANUEL COUNTY, GEORGIA**

**CERTIFICATE OF SERVICE**

I, Jon A. Levis, of the firm of Merrill & Stone, Attorneys at Law, Post Office Box 129, Swainsboro, Georgia 30401, do hereby certify that I have served a copy of the within foregoing **MOTION FOR EXPEDITED HEARING ON DEBTOR'S MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTOR TO OBTAIN POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§105, 361, 362, 364(b) AND (II) GRANTING RELATED RELIEF, CERTIFICATE OF NEED, ORDER ON MOTION FOR EXPEDITED HEARING ON APPLICATION FOR HEARING** to:

Matthew E. Mills, Esq.  
Office of the U.S. Trustee  
Johnson Square Business Center  
2 East Bryan Street, Suite 725  
Savannah, GA 31401

Joshua E. Kight, Esq.  
Attorney At Law  
Post Office Box 816  
Dublin, GA 31040

Edward B. Claxton, III, Esq.  
Edward B. Claxton, III, LLC  
Post Office Box 16459  
Dublin, GA 31040

Mr. Lucas Cowart  
Morris State Bank  
Post Office Box 520  
Dublin, GA 31040

by email and/or mailing a copy through the United States mail with sufficient postage attached thereto to assure delivery.

**THIS** the 1st day of May, 2015.

**MERRILL & STONE, LLC**

**s/Jon A. Levis**

**JON A. LEVIS, ESQ.  
ATTORNEY FOR DEBTOR  
GEORGIA BAR NO: 448848**

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